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April 26, 2025

VIA ELECTRONIC FILING

Honorable Wendy A. Kinsella
United States Bankruptcy Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13202

Re: *The Roman Catholic Diocese of Syracuse, New York;
Chapter 11 Case No. 20-30663*

Dear Chief Judge Kinsella:

As previously reported to the Court, in accordance with the provisions of 11 U.S.C. § 1127(a), The Roman Catholic Diocese of Syracuse, New York (the “Diocese”) and the Official Committee of Unsecured Creditors (the “Committee,” and, together with the Diocese, the “Plan Proponents”) intend to make modifications to the *Fifth Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* [Docket No. 2337] (the “Plan”)¹ (i) to clarify certain provisions, (ii) to address certain objections to confirmation of the Plan, and (iii) to make adjustments as specifically directed by the Court or requested by creditors or parties in interest. The Plan Proponents anticipate that any such modifications will either be non-material in nature or will be made with the consent of any affected creditors.

In order to provide the Court and parties in interest with a roadmap of the Plan Proponents’ proposed changes, and in the interest of narrowing the issues that must be addressed at the upcoming confirmation hearing, attached hereto as **Exhibit A** is a redline of the Plan reflecting (i) the modifications proposed in the *Plan Proponents’ Omnibus Reply to Objections to the Fifth Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* [Docket No. 2814], (ii) modified treatment with respect to the Class 2 Secured Claim of NBT Bank which has been requested by NBT Bank and agreed to by the Plan Proponents, (iii) correcting the amount of the Participating Parties’ Cash Contribution from \$49 million to

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

April 26, 2025
Page 2

\$50 million, and (iv) incorporating the Participating Parties' agreement with the Unknown Claimant Representative.

The Plan Proponents expect that additional modifications to the Plan will be requested by one or more of the several Insurers who recently reached agreement with the Plan Proponents to become Settling Insurers, and the Plan Proponents will keep the Court apprised of any such proposed modifications.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

/s/ Stephen A. Donato
Stephen A. Donato

cc: All ECF notice parties